

In regards to WT RM-10354, in which petitioner Rippey has filed for changes to Part 97 to augment and increase Amateur Novice license privileges, the following comments are submitted for consideration.

The petition appears to be concerned with the lack of operating privileges for entry-class licensees in the Amateur service. The fact today is that Novices comprise less than 8 percent of the total US Amateur population.¹ Less than 3 percent of the Amateur license administrative changes recently processed by the FCC concern Novices.² As an ARRL Volunteer Examiner (VE) since the inception of the VE program, I can remember only one candidate who elected to stop at the Novice level license without proceeding further. All other candidates my group tested went on to higher license classes.

Further, the petition would seek to ignore the fact that in the 50s, Novice licenses were only valid for one year – “up or out”. If the licensee failed to upgrade in that year, the license expired without recourse. This is no longer true, however what is true today is that Novices who do not upgrade generally do not renew. This illustrates the value of the entry-level Amateur license principle in general – those who are truly smitten of the radio “bug” will find upgrading the only path to satisfy their desire for more exposure and more bandwidth to operate within.

Finally, the petition is specious in it’s disregard for the entire incentive licensing process. Unlike many other aspects of society, the Amateur Radio service is one where the individual is in control of their operating manner, schedule, study/mentoring time, and privileges gained through upgrading through the incentive licensing process. While Rippey may pine for the days during which he received his first license, it is abundantly clear to the most casual observer that the privileges extended today to the Novice licensee are far and away superior to those he first enjoyed as a Novice in the 1950s.

I urge the Commission to dismiss this petition in light of the demonstrated success of the incentive license upgrade process to endow those Amateurs who have a true interest in furthering the radio art (by upgrading) with the very privileges Rippey would have granted to entry-level licensees.

Respectfully submitted,

Mike Mello, N5MJ

¹ <http://www.qrz.com/census.htm>

² http://www.qrz.com/new_hams.html